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May 2, 2016

Pat Brysse, Ph.D.

Director

Agency for Toxic Substances and Disease Registry

Centers for Disease Control and Prevention

1600 Clifton Road NE

MS-D74

Atlanta, GA 30329

Docket No: **ATSDR-2016-0002**

Dear Dr. Brysse:

On behalf of the American Academy of Pediatrics (AAP), a non-profit professional organization of 64,000 primary care pediatricians, pediatric medical sub-specialists, and pediatric surgical specialists dedicated to the health, safety and well-being of infants, children, adolescents, and young adults, we appreciate the opportunity to provide input on the Agency for Toxic Substances and Disease Registry (ATSDR) information collection regarding the proposed study of health risks associated with crumb rubber, used frequently in playing fields used by children and adolescents.

The AAP applauds ATSDR, the Environmental Protection Agency (EPA), and the Consumer Product Safety Commission (CPSC) for devoting resources to the study of exposures and possible human health risks from crumb rubber playing fields and playgrounds. As you know, there has been significant news coverage of possible adverse health outcomes associated with these playing surfaces. However, there are large data gaps in our knowledge of the precise health effects of playing on these surfaces, particularly for infants, children, adolescents, and young adults. Given the potentially serious health outcomes, such as cancer, it is appropriate that ATSDR, EPA, and CPSC undertake a study of the health risks associated with crumb rubber. The AAP urges you to focus your study and analysis on in particular on the public health impacts, including those in children.

The Federal Register Notice of February 18, 2016 indicates that the agencies may engage with stakeholders prior to study initiation. The AAP supports this step, and urges that among the stakeholders you consult should be pediatricians with expertise in environmental health, toxicology, and sports medicine, particularly with regards to the second study, the "Characterization of Exposure Potential during Activities Conducted on Synthetic Turf with Crumb Rubber Infill." For example, these pediatricians may be able to assist ATSDR in identifying the population that routinely performs activities that would result in a high level of contact to crumb rubber surfaces.

With regard to the first study contemplated, “Determination of Field Operating Procedures, Use Conditions, and Chemical Composition of Crumb Rubber Infill in Synthetic Turf Fields,” facilities should be required to supply samples from their synthetic turf fields with crumb rubber infill. This additional data can help future researchers, including independent pediatric experts, better understand the chemical composition of crumb rubber infill and its potential effects on child health.

We also support the undertaking of surveys and focus groups of parents/caregivers as part of the CPSC’s work on this study, as well as the CPSC’s focus on outdoor playgrounds that may be built with crumb rubber “mulch” or unitary tiles. As part of its investigation of outdoor playgrounds, we strongly urge CPSC to consider a broader age range of children than those between the ages of 3 and 5, as mouthing behaviors can start in infants, and continue in older children. Mouthing and sucking activity among infants and very young children is a very common and necessary part of early childhood behavior that satisfies both nutritive (e.g. breast or bottle feeding) and non-nutritive (e.g. pacifier, toy, blanket) needs. Research indicates that from two months of age to 36 months, children engage in mouthing behavior between 20 minutes to 2.5 hours per day, with a decline as children increase in age (and in some children with a cessation of such behaviors after age 5). Given this developmentally appropriate behavior, it is understandable why very young children would readily put loose tire crumb “mulch” materials in their mouths.

The AAP also supports the agencies investigation of various types of crumb rubber infill, including loose tire crumb and unitary crumb rubber surfaces. However, we urge you to consider exposure to these materials not only at room temperature and at temperatures simulating a hot summer day, but also at spring-like or cooler temperatures, as the crumb rubber playing surface can still get quite hot due to sun exposure, and still pose a risk to children and adolescents.

Thank you again for the opportunity to provide input on this information collection. If we can be of any further assistance, please do not hesitate to contact Ami Gadhia in our Washington, D.C. office at 202/347-8600 or agadhia@aap.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Benard P. Dreyer". The signature is fluid and cursive, with the first name "Benard" being more prominent than the last name "Dreyer".

Benard P. Dreyer, MD, FAAP
President
BPD/avg